

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

November 29 2018
WILLIAM M. McCOOL, Clerk
By Asst. Clerk Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO.

CR 18-5579 RBL

INDICTMENT

- (1) CARLOS EDUARDO LOPEZ HERNANDEZ,
 - (2) DANIEL OSVALDO ROCHA LOPEZ,
 - (3) JAIME HEREDIA CASTRO,
 - (4) JUAN AVILES BERRELLEZA,
 - (5) EDGAR CABRERA,
 - (6) CARLOS ALEJANDRO CASTRO PEREZ,
 - (7) CESAR LOYA SOTO,
 - (8) MANUEL LOYA SOTO,
 - (9) JULIAN GAUGE ORDONEZ,
 - (10) JOSE LUIS SIERRA BARRIENTOS,
 - (11) HECTOR MANUEL URIAS MORENO,
 - (12) JORGE VALENZUELA ARMENTA,
 - (13) URIEL ZELAYA,
 - (14) ARTURO FRIAS CEBALLOS,
 - (15) JUAN JOSE HIGUERA GONZALEZ,
 - (16) JESUS RENE SARMIENTO VALENZUELA,
 - (17) ALEK JAMES BAUMGARTNER,
 - (18) MONIQUE GREEN,
 - (19) ANDREW CAIN KRISTOVICH,
 - (20) BRIAN LIVELY,
 - (21) JOSE RANGEL ORTEGA,

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- (22) GERALD KEITH RIGGINS,
- (23) ESTHER LA RENA SCOTT,
- (24) MICHAEL JOHN SCOTT,
- (25) KAREN SURYAN,
- (26) ORLANDO BARAJAS,
- (27) OSCAR HUMBERTO CARRILLO SALCEDO,
- (28) MARTIN GONZALEZ JIMENEZ,
- (29) HECTOR MARIO JACOBO CHAIREZ,
- (30) JESUS ALFONSO MORA QUINONEZ, and
- (31) RAMON PUENTES,

Defendants.

The Grand Jury charges that:

COUNT 1
(Conspiracy to Distribute Controlled Substances)

15 Beginning at a time unknown and continuing until on or about November 28,
16 2018, in Pierce, Kitsap, King, Skagit, and Snohomish Counties, within the Western
17 District of Washington, and elsewhere, CARLOS EDUARDO LOPEZ HERNANDEZ,
18 DANIEL OSVALDO ROCHA LOPEZ, JAIME HEREDIA CASTRO, JUAN AVILES
19 BERRELLEZA, EDGAR CABRERA, CARLOS ALEJANDRO CASTRO PEREZ,
20 CESAR LOYA SOTO, MANUEL LOYA SOTO, JULIAN GAUGE ORDONEZ, JOSE
21 LUIS SIERRA BARRIENTOS, HECTOR MANUEL URIAS MORENO, JORGE
22 VALENZUELA ARMENTA, URIEL ZELAYA, ARTURO FRIAS CEBALLOS, JUAN
23 JOSE HIGUERA GONZALEZ, JESUS RENE SARMIENTO VALENZUELA, ALEK
24 JAMES BAUMGARTNER, MONIQUE GREEN, ANDREW CAIN KRISTOVICH,
25 BRIAN LIVELY, JOSE RANGEL ORTEGA, GERALD KEITH RIGGINS, ESTHER
26 LA RENA SCOTT, MICHAEL JOHN SCOTT, KAREN SURYAN, ORLANDO
27 BARAJAS, OSCAR HUMBERTO CARRILLO SALCEDO, MARTIN GONZALEZ
28 JIMENEZ, HECTOR MARIO JACOB CHAIREZ, JESUS ALFONSO MORA

1 QUINONEZ, RAMON PUENTES, and others known and unknown, did knowingly and
2 intentionally conspire to distribute substances controlled under Title 21, United States
3 Code, Section 812, Schedules I and II, to wit: heroin, Fentanyl, heroin, and
4 methamphetamine, contrary to the provisions of Title 21, United States Code.

5 ***Specific Quantity Allegations as to Heroin***

6 The Grand Jury further alleges that with respect to CARLOS EDUARDO LOPEZ
7 HERNANDEZ, DANIEL OSVALDO ROCHA LOPEZ, JAIME HEREDIA CASTRO,
8 JUAN AVILES BERRELLEZA, CARLOS ALEJANDRO CASTRO PEREZ, CESAR
9 LOYA SOTO, JOSE LUIS SIERRA BARRIENTOS, HECTOR MANUEL URIAS
10 MORENO, ARTURO FRIAS CEBALLOS, JUAN JOSE HIGUERA GONZALEZ,
11 JESUS RENE SARMIENTO VALENZUELA, GERALD KEITH RIGGINS, MARTIN
12 GONZALEZ JIMENEZ, HECTOR MARIO JACOBO CHAIREZ, and JESUS
13 ALFONSO MORA QUINONEZ, their conduct as members of the conspiracy charged in
14 Count 1, which includes the reasonably foreseeable conduct of other members of the
15 conspiracy charged in Count 1, involved 1 kilogram or more of a mixture or substance
16 containing a detectable amount of heroin, in violation of Title 21, United States Code,
17 Section 841(b)(1)(A).

18 The Grand Jury further alleges that with respect to MONIQUE GREEN, KAREN
19 SURYAN, and URIEL ZELAYA, their conduct as members of the conspiracy charged in
20 Count 1, which includes the reasonably foreseeable conduct of other members of the
21 conspiracy charged in Count 1, involved 100 grams or more of a mixture or substance
22 containing a detectable amount of heroin, in violation of Title 21, United States Code,
23 Section 841(b)(1)(B).

24 ***Specific Quantity Allegations as to Fentanyl***

25 The Grand Jury further alleges that this with respect to CARLOS EDUARDO
26 LOPEZ HERNANDEZ, DANIEL OSVALDO ROCHA LOPEZ, JAIME HEREDIA
27 CASTRO, JUAN AVILES BERRELLEZA, CARLOS ALEJANDRO CASTRO PEREZ,
28 CESAR LOYA SOTO, MANUEL LOYA SOTO, HECTOR MANUEL URIAS

1 MORENO, JORGE VALENZUELA ARMENTA, ARTURO FRIAS CEBALLOS,
2 JUAN JOSE HIGUERA GONZALEZ, JESUS RENE SARMIENTO VALENZUELA,
3 ANDREW CAIN KRISTOVICH, BRIAN LIVELY, ESTHER LA RENA SCOTT,
4 MICHAEL JOHN SCOTT, MARTIN GONZALEZ JIMENEZ, JESUS ALFONSO
5 MORA QUINONEZ, and RAMON PUENTES, their conduct as members of the
6 conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of
7 other members of the conspiracy charged in Count 1, involved 400 grams or more of a
8 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-
9 4-piperidinyl] propanamide (Fentanyl), and 100 grams or more of any analogue of N-
10 phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), in violation of Title
11 21, United States Code, Section 841(b)(1)(A).

12 The Grand Jury further alleges that with respect to ALEK JAMES
13 BAUMGARTNER and JOSE RANGEL ORTEGA, their conduct as members of the
14 conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of
15 other members of the conspiracy charged in Count 1, involved 40 grams or more of a
16 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-
17 4-piperidinyl] propanamide (Fentanyl), and 10 grams or more of any analogue of N-
18 phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), in violation of Title
19 21, United States Code, Section 841(b)(1)(B.).

20 ***Specific Quantity Allegations as to Methamphetamine***

21 The Grand Jury further alleges that with respect to CARLOS EDUARDO LOPEZ
22 HERNANDEZ, DANIEL OSVALDO ROCHA LOPEZ, EDGAR CABRERA, CARLOS
23 ALEJANDRO CASTRO PEREZ, JULIAN GAUGE ORDONEZ, URIEL ZELAYA, and
24 MARTIN GONZALEZ JIMENEZ, their conduct as members of the conspiracy charged
25 in Count 1, which includes the reasonably foreseeable conduct of the other members of the
26 conspiracy charged in Count 1, involved 50 grams or more of methamphetamine, its salts,
27 isomers, and salts of its isomers, and 500 grams or more of a mixture or substance

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1 containing a detectable amount of methamphetamine, its salts, isomers, and salts of its
2 isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

3 The Grand Jury further alleges that with respect to ANDREW CAIN
4 KRISTOVICH, his conduct as a member of the conspiracy charged in Count 1, which
5 includes the reasonably foreseeable conduct of the other members of the conspiracy
6 charged in Count 1, involved 5 grams or more of methamphetamine, its salts, isomers,
7 and salts of its isomers, and 50 grams or more of a mixture or substance containing a
8 detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, in
9 violation of Title 21, United States Code, Section 841(b)(1)(B).

10 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1), and
11 846.

12 **COUNT 2**
13 **(Conspiracy to Commit Money Laundering)**

14 Beginning at a time unknown, but within the last five years, and continuing
15 through November 28, 2018, in Skagit County, within the Western District of
16 Washington, and elsewhere, JAIME HEREDIA CASTRO, ORLANDO BARAJAS, and
17 others known and unknown, unlawfully and knowingly combined, conspired,
18 confederated and agreed together and with each other to commit certain money
19 laundering offenses under Title 18, United States Code, Section 1956, as follows:

20 **1956(a)(1)(B)(i)**

21 Did conduct and attempt to conduct financial transactions, that is: transactions
22 involving the movement of funds by wire and other means affecting interstate and foreign
23 commerce, which in fact involved the proceeds of specified unlawful activity, that is,
24 conspiracy to distribute controlled substances, in violation of Title 21, United States
25 Code, Sections 841(a)(1) and 846, knowing that the transactions are designed in whole or
26 in part to conceal and disguise the nature, the location, the source, the ownership, and the
27 control of the proceeds of the specified unlawful activity, in violation of Title 18, United
28 States Code, Section 1956(a)(1)(B)(i); and

1956(a)(1)(B)(ii)

Did conduct and attempt to conduct financial transactions, that is: transactions involving the movement of funds by wire and other means affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, knowing that the transactions are designed in whole or in part to avoid a transaction reporting requirement under State and Federal Law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

The Grand Jury further alleges this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 3

(Conspiracy to Commit Money Laundering)

Beginning at a time unknown, but within the last five years, and continuing through November 28, 2018, in King County, within the Western District of Washington, and elsewhere, OSCAR HUMBERTO CARRILLO SALCEDO, CARLOS EDUARDO LOPEZ HERNANDEZ, DANIEL OSVALDO ROCHA LOPEZ, EDGAR CABRERA, and others known and unknown, unlawfully and knowingly combined, conspired, confederated and agreed together and with each other to commit certain money laundering offenses under Title 18, United States Code, Section 1956, as follows:

1956(a)(1)(B)(i)

Did conduct and attempt to conduct financial transactions, that is: transactions involving the movement of funds by wire and other means affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, knowing that the transactions are designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

1956(a)(1)(B)(ii)

2 Did conduct and attempt to conduct financial transactions, that is: transactions
3 involving the movement of funds by wire and other means affecting interstate and foreign
4 commerce, which in fact involved the proceeds of specified unlawful activity, that is,
5 conspiracy to distribute controlled substances, in violation of Title 21, United States
6 Code, Sections 841(a)(1) and 846, knowing that the transactions are designed in whole or
7 in part to avoid a transaction reporting requirement under State and Federal Law, in
8 violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

9 The Grand Jury further alleges this offense was committed during and in
10 furtherance of the conspiracy charged in Count 1, above.

11 All in violation of Title 18, United States Code, Section 1956(h).

ASSET FORFEITURE ALLEGATIONS

Drug Offense

14 The allegations in Count 1 of this Indictment are hereby realleged and
15 incorporated by reference herein for the purpose of alleging forfeiture to the United
16 States pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of the
felony drug offense charged in Count 1 of this Indictment, defendants CARLOS
EDUARDO LOPEZ HERNANDEZ, DANIEL OSVALDO ROCHA LOPEZ, JAIME
HEREDIA CASTRO, JUAN AVILES BERRELLEZA, EDGAR CABRERA, CARLOS
ALEJANDRO CASTRO PEREZ, CESAR LOYA SOTO, MANUEL LOYA SOTO,
JULIAN GAUGE ORDONEZ, JOSE LUIS SIERRA BARRIENTOS, HECTOR
MANUEL URIAS MORENO, JORGE VALENZUELA ARMENTA, URIEL ZELAYA,
ARTURO FRIAS CEBALLOS, JUAN JOSE HIGUERA GONZALEZ, JESUS RENE
SARMIENTO VALENZUELA, MONIQUE GREEN, ANDREW CAIN KRISTOVICH,
JOSE RANGEL ORTEGA, GERALD KEITH RIGGINS, ESTHER LA RENA SCOTT,
MICHAEL JOHN SCOTT, KAREN SURYAN, ORLANDO BARAJAS, OSCAR
HUMBERTO CARRILLO SALCEDO, MARTIN GONZALEZ JIMENEZ, HECTOR

1 MARIO JACOBO CHAIREZ, JESUS ALFONSO MORA QUINONEZ, and RAMON
2 PUENTES, shall forfeit to the United States of America any and all property, real or
3 personal, constituting or derived from, any proceeds the defendants obtained, directly or
4 indirectly, as the result of such offenses, and shall further forfeit any and all property, real
5 or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate
6 the commission of, such offenses. The property to be forfeited includes, but is not
7 limited to, the following:

- 8 a. One hundred sixty-four thousand, one hundred and sixteen dollars
9 (\$164,116.00), more or less, seized from 31900 104th Avenue Southeast,
10 Unit I-101, Auburn, Washington, on August 31, 2018;
- 11 b. Four pairs of shoes; and
- 12 c. A sum of money representing the proceeds that each defendant obtained as
13 a result of the Conspiracy to Distribute Controlled Substances, as alleged in
14 Count 1, above.

15 ***Money Laundering Offenses***

16 The allegations in Counts 2 and 3 of this Indictment are hereby realleged and
17 incorporated by reference herein for the purposes of alleging forfeiture to the United
18 States pursuant to Title 18, United States Code, Section 982(a)(1).

19 Upon conviction of the felony offense in violation of Title 18, United States Code,
20 Sections 1956, as charged in Counts 2 and 3 of this Indictment, defendants JAIME
21 HEREDIA CASTRO, ORLANDO BARAJAS, OSCAR HUMBERTO CARRILLO
22 SALCEDO, CARLOS EDUARDO LOPEZ HERNANDEZ, DANIEL OSVALDO
23 ROCHA LOPEZ, and EDGAR CABRERA, shall forfeit to the United States of America
24 any property, real or personal, involved in such offenses, and any property traceable to
25 such property, including but not limited to the following,

- 26 a. A sum of money representing any property, real or personal, involved in the
27 offenses charged in Counts 2 and 3 of this Indictment, and any property
28 traceable to such property.

1 ***Substitute Assets***

2 If any of the property described above, as a result of any act or omission of the
3 defendants:

- 4 a. cannot be located upon the exercise of due diligence;
5 b. has been transferred or sold to, or deposited with, a third party;
6 c. has been placed beyond the jurisdiction of the Court;

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- d. has been diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

4 it is the intent of the United States, pursuant to Title 21, United States Code, Section
5 853(p), to seek the forfeiture of any other property of the defendants up to the value of
6 the above-described forfeitable property.

A TRUE BILL:

DATED: 11-28-2018

*(Signature of Foreperson redacted
pursuant to the policy of the Judicial
Conference of the United States)*

FOREPERSON

ANNETTE L. HAYES
United States Attorney


SARAH Y. VOGEL
Assistant United States Attorney

Ellsworth
MARCI L. ELLSWORTH
Assistant United States Attorney

Karyn S. Johnson
KARYN S. JOHNSON
Assistant United States Attorney

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